

IN THE WAITANGI TRIBUNAL

Wai 2490

IN THE MATTER OF The Treaty of Waitangi Act 1975

AND

IN THE MATTER OF The Ngāpuhi Mandate Inquiry

**MEMORANDUM OF COUNSEL
9 MARCH 2015**

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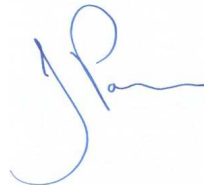
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MAY IT PLEASE THE TRIBUNAL

1. Counsel refer to the Tribunal's memorandum-directions of 5 March 2015 (Wai 2490, #2.7.8).
2. Counsel are instructed that:
 - (a) The Trustees of the Tūhoronuku Independent Mandated Authority intend to shortly appoint negotiators.
 - (b) Under clause 7.1 of its Deed of Trust,¹ a minimum of three and no more than six negotiators may be appointed.
 - (c) It is not intended to fill more than three negotiator positions at this stage. Accordingly, it will be possible to make further appointments in the future.
 - (d) It is anticipated that initially the negotiators will be focussed on the hapū of Ngāpuhi to establish the settlement aspirations of those hapū.
 - (e) In this regard, it is expected that the draft Engagement Plan,² which has been prepared pursuant to the conditions imposed on the recognition of mandate, will soon be finalised. This provides for hapū profiles to be developed which will inform negotiation strategies in respect of each hapū's interests.
 - (f) While there may be meetings between the Tūhoronuku IMA and Crown negotiators, it is not expected that substantive negotiations will begin until the second half of this year.

Dated 9 March 2015



J D Every-Palmer | A S Olney
Counsel for Tūhoronuku IMA

To: The Registrar of the Waitangi Tribunal

¹ Exhibit RT-2 to Affidavit of Rāniera (Sonny) Tau (Wai 2490 #A25(a)), dated 4 June 2014.
² Exhibit "U" to Brief of evidence of Rāniera Teitinga (Sonny) Tau (Wai 2490 #A098), dated 18 November 2014.